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March 26, 2014

BY HAND DELIVERY AND ELECTRONIC MAIL

The Honorable Shira A. Scheindlin
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1620
New York, New York 10007-1312

Re: Master File C.A. No. 1:00-1898 (SAS), M21-88, MDL No. 1358
Commonwealth of Puerto Rico, et al. v. Shell Oil Co., et al., No. 14-cv-01014

Dear Judge Scheindlin:

I am writing on behalf of Defendants in the second Puerto Rico action, No. 14-cv-01014, to request that the deadline for all Defendants to respond to the complaint be extended until May 26, 2014 – the date ordered by the Court for the Trammo and Peerless defendants to respond. There are a number of defendants who will be filing 12(b) motions in lieu of answering the complaint, and a single response date will allow us to better coordinate those motions.

I requested Plaintiffs' consent to this single deadline earlier today but have not yet received a response. As tomorrow is the deadline for many defendants to respond to the complaint, we did not want to wait any longer before requesting this extension for a single response date.

Sincerely,

Stephen J. Riccardulli

Stephen J. Riccardulli

cc: All Counsel of Record by LNFS